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March 6, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: In the Matter of Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges (“Cramming”), CG Docket No. 11-116; In the Matter of Consumer Information and Disclosure, CG Docket No. 09-158; In the Matter of Truth-in-Billing Format, CC Docket No. 98-170

Dear Ms. Dortch:

On March 5, 2012, Norman Phipps, Chief Financial Officer of BSG Clearing Solutions (“BSG”), Kelli Petronis Cubeta, General Counsel of BSG, Donald Stockdale of Mayer Brown LLP, and the undersigned met with Kris Monteith, Mark Stone, Kurt Schroeder, Michael Jacobs, Melissa Conway, and Lynn Ratnavale, all of the Consumer and Governmental Affairs Bureau. The purpose of the meeting was to explain the safeguards that BSG has adopted to prevent cramming.

We explained that BSG is the largest third-party wireline billing aggregator, and that it has been engaged in third-party billing for over twenty years. We described the safeguards BSG has adopted to prevent cramming. BSG employs a detailed due-diligence process for potential third-party service providers that includes a 100-point check list, site visits, background checks, the actual purchase by BSG of a third-party provider’s service, and verification of all transactions in the first file of record. This due-diligence process takes between three and nine months to complete for each new client.

We also explained BSG’s monthly monitoring program, under which, if a service provider exceeds any one of BSG’s three inquiry thresholds, BSG will conduct further sampling and investigation. If the service provider is unable to successfully complete the testing process, BSG will terminate its relationship with the provider. We also described the additional consumer authorization procedures that BSG requires of providers that sign up customers on-line.

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We indicated that BSG supports many of the proposals contained in the Notice of Proposed Rulemaking in the above-referenced docket, including requiring the screening of new service providers, verification of third-party contact information, and monitoring and tracking of customer inquiries and complaints. BSG also supports a requirement that carriers offer an opt-out procedure to customers. Finally, BSG explained why it opposes requiring customers to opt-in to third-party billing.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please feel free to contact me.

Sincerely,

/s/ Howard W. Waltzman

Howard W. Waltzman

Cc: (via e-mail)
Kris Monteith
Mark Stone
Kurt Schroeder
Michael Jacobs
Melissa Conway
Lynn Ratnavale